

CONFIDENTIAL

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***** PREDECISIONAL DOCUMENT *****

SUMMARY SCORESHEET
FOR COMPUTING PROJECTED HRS SCORE

SITE NAME: American National Can Company

CITY, COUNTY: Oakland, Alameda County

EPA ID #: CAD009162116 EVALUATOR: Celia Shryne

PROGRAM ACCOUNT #: FCA1778RAA DATE: 5/29/91

Lat/Long: 37°46'09"/122°13'21" T/R/S: T2S/R3W/Section 8

THIS SCORESHEET IS FOR A: PA SSI LSI

SIRe PA Redo Other (Specify) RCRA PA

RCRA STATUS (check all that apply):

 X Generator Small Quantity Generator Transporter X TSDF

 Not Listed in RCRA Database as of (date of printout) / /

STATE SUPERFUND STATUS:

 BEP (date) / / WQARF (date) / /

 X No State Superfund Status (date) 1/ 10/90

	S pathway	S ² pathway
Groundwater Migration Pathway Score (S _{gw})	0*	0
Surface Water Migration Pathway Score (S _{sw})	24.01	576.4801
Soil Exposure Pathway Score (S _s)	0**	0
Air Migration Pathway Score (S _a)	0**	0
$S_{gw}^2 + S_{sw}^2 + S_s^2 + S_a^2$	XXXXXXXXXX	576.4801
$(S_{gw}^2 + S_{sw}^2 + S_s^2 + S_a^2)/4$	XXXXXXXXXX	144.1200
$\sqrt{(S_{gw}^2 + S_{sw}^2 + S_s^2 + S_a^2)/4}$	XXXXXXXXXX	12.01

*Pathways not assigned a score (explain):

* Groundwater is not used for drinking.

** The entire site is paved and all stored wastes have apparently been removed.

cs/anc/hrs

21-May-1991

GROUNDWATER MIGRATION PATHWAY SCORESHEET

Factor Categories and Factors

Likelihood of Release	Maximum Value	Projected Score	Rationale	Data Qual.
1. Observed Release	550	550	1	E
2. Potential to Release				
2a. Containment	10	10	2	E
2b. Net Precipitation	10	6	3	H
2c. Depth to Aquifer	5	5	4	E
2d. Travel Time	35	35	5	E
2e. Potential to Release [Lines 2a x (2b+2c+2d)]	500	460		
3. Likelihood of Release (Higher of lines 1 or 2e)	550	550		
<u>Waste Characteristics</u>				
4. Toxicity/Mobility	a	100	6	H
5. Hazardous Waste Quantity	a	100	7	E
6. Waste Characteristics (lines 4 x 5, then use Table 2-7)	100	60		
<u>Targets</u>				
7. Nearest Well	50	0	8	E
8. Population ^d				
8a. Level I Concentrations	b			
8b. Level II Concentrations	b			
8c. Potential Contamination	b	0		
8d. Population (lines 8a+8b+8c)	b	0		
9. Resources	5	0		
10. Wellhead Protection Area	20			
11. Targets (lines 7+8d+9+10)	b	0		
<u>Likelihood of Release</u>				
12. Aquifer Score [(Lines 3 x 6 x 11)/82,500] ^c	100	0		
<u>Groundwater Migration Pathway Score</u>				
13. Pathway Score (Sgw), (highest value from line 12 for all aquifers evaluated)	100	0		

- a Maximum value applies to waste characteristics category.
b Maximum value not applicable.
c Do not round to the nearest integer.
d Use additional tables.

SURFACE WATER OVERLAND/FLOOD MIGRATION COMPONENT SCORESHEET

Factor Categories and Factors

DRINKING WATER THREAT

<u>Likelihood of Release</u>	<u>Maximum Value</u>	<u>Projected Score</u>	<u>Rationale</u>	<u>Data Qual.</u>
1. Observed Release	550	<u>550</u>	<u>9</u>	<u>E</u>
2. Potential to Release by Overland Flow				
2a. Containment	10	<u>10</u>	<u>10</u>	<u>E</u>
2b. Runoff	25	<u>1</u>	<u>11</u>	<u>E</u>
2c. Distance to Surface Water	25	<u>16</u>	<u>12</u>	<u>E</u>
2d. Potential to Release by Overland Flow [lines 2a x (2b+2c)]	500	<u>170</u>		
3. Potential to Release by Flood				
3a. Containment (Flood)	10	<u>10</u>	<u>13</u>	<u>E</u>
3b. Flood Frequency	50	<u>25</u>	<u>14</u>	<u>E</u>
3c. Potential to Release by Flood (lines 3a x 3b)	500	<u>250</u>		
4. Potential to Release (Lines 2d+3c, subject to a maximum of 500)	500	<u>420</u>		
5. Likelihood of Release (Higher of lines 1 or 4)	550	<u>550</u>		

Waste Characteristics

6. Toxicity/Persistence	a			
7. Hazardous Waste Quantity	a			
8. Waste Characteristics (lines 6 x 7, then assign a value from Table 2-7)	100			

Targets

9. Nearest Intake	50	<u>0</u>		
10. Population				
10a. Level I Concentrations	b			
10b. Level II Concentrations	b			
10c. Potential Contamination	b			
10d. Population (lines 10a + 10b+10c)	b	<u>0</u>		
11. Resources	5			
12. Targets (lines 9+10d+11)	b	<u>0</u>		

Drinking Water Threat Score

13. Drinking Water Threat [(Lines 5 x 8 x 12)/82,500, subject to a maximum of 100]	100	<u>0</u>		
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SURFACE WATER OVERLAND/FLOOD MIGRATION COMPONENT SCORESHEET (CONTINUED)

Factor Categories and Factors

HUMAN FOOD CHAIN THREAT

<u>Likelihood of Release</u>	<u>Maximum Value</u>	<u>Projected Score</u>	<u>Rationale</u>	<u>Data Qual.</u>
14. Likelihood of Release (Same value as line 5)	550	<u>550</u>	<u> </u>	<u>E</u>
<u>Waste Characteristics</u>				
15. Toxicity/Persistence/ Bioaccumulation	a	<u>5x10⁷</u>	<u>15</u>	<u>H</u>
16. Hazardous Waste Quantity	a	<u>100</u>	<u>7</u>	<u>E</u>
17. Waste Characteristics (Toxicity/Persistence x Hazardous Waste Quantity x Bioaccumulation, then assign a value from Table 2-7)	1,000	<u>180</u>	<u> </u>	<u> </u>
<u>Targets</u>				
18. Food Chain Individual	50	<u>20</u>	<u>16</u>	<u>E</u>
19. Population ^d				
19a. Level I Concentrations	b	<u> </u>	<u> </u>	<u> </u>
19b. Level II Concentrations	b	<u> </u>	<u> </u>	<u> </u>
19c. Potential Human Food Chain Contamination	b	<u>0.00031</u>	<u> </u>	<u>E</u>
19d. Population (lines 19a+19b+19c)	b	<u>0.00031</u>	<u> </u>	<u> </u>
20. Targets (lines 18+19d)	b	<u>20.0031</u>	<u> </u>	<u> </u>
<u>Human Food Chain Threat Score</u>				
21. Human Food Chain Threat [(Lines 14 x 17 x 20)/82,500 subject to a maximum of 100]	100	<u>24.00</u>	<u> </u>	<u> </u>

SURFACE WATER OVERLAND/FLOOD MIGRATION COMPONENT SCORESHEET (CONTINUED)

Factor Categories and Factors

ENVIRONMENTAL THREAT

<u>Likelihood of Release</u>	<u>Maximum Value</u>	<u>Projected Score</u>	<u>Rationale</u>	<u>Data Qual.</u>
22. Likelihood of Release (Same value as line 5)	550	<u>550</u>	<u> </u>	<u>E</u>
<u>Waste Characteristics</u>				
23. Ecosystem Toxicity/Persistence/ Bioaccumulation	a	<u>5×10^7</u>	<u>17</u>	<u>H</u>
24. Hazardous Waste Quantity	a	<u>100</u>	<u>7</u>	<u>E</u>
25. Waste Characteristics (Ecosystem Tox./Persistence x Hazardous Waste Quantity x Bioaccumulation, then assign a value from Table 2-7)	1,000	<u>180</u>	<u> </u>	<u> </u>
<u>Targets</u>				
26. Sensitive Environments ^d				
26a. Level I Concentrations	b	<u> </u>	<u> </u>	<u> </u>
26b. Level II Concentrations	b	<u> </u>	<u> </u>	<u> </u>
26c. Potential Contamination	b	<u>0.00525</u>	<u>18</u>	<u>E</u>
26d. Sensitive Environments (lines 26a+26b+26c)	b	<u>0.00525</u>	<u> </u>	<u> </u>
27. Targets (Value from line 26d)	b	<u>0.00525</u>	<u> </u>	<u> </u>
<u>Environmental Threat Score</u>				
28. Environmental Threat Score [(lines 22 x 25 x 27)/82,500 subject to a maximum of 60]	60	<u>0.0063</u>	<u> </u>	<u> </u>

SURFACE WATER OVERLAND/FLOOD MIGRATION COMPONENT SCORE FOR A WATERSHED

29. Watershed Score [(Lines 13+21+28), subject to a maximum of 100]	100	<div style="border: 1px solid black; padding: 2px; display: inline-block;">24.01^c</div>
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SURFACE WATER OVERLAND/FLOOD MIGRATION COMPONENT SCORE

30. Component Score (Sof) (Highest score from Line 29 for all watersheds evaluated, subject to a maximum of 100)	100	<div style="border: 1px solid black; padding: 2px; display: inline-block;">24.01^c</div>
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- a Maximum value applies to waste characteristics category.
b Maximum value not applicable.
c Do not round to the nearest integer.
d Use additional tables

SURFACE WATER OVERLAND/FLOOD MIGRATION COMPONENT CALCULATIONS (CONTINUED)

20. Food Chain Targets

Actual Contamination

N/A

Fishery	Contaminant	Concentration	Benchmark	(A) Assigned Population Value (Table 4-18)	(B) Level* Multiplier	(A x B)
Sum (A x B) Level I						
Sum (A x B) Level II						

*** Level Multipliers**

- Level I = 10

- Level II = 1

Potential Contamination

Fishery	Production (lb/yr)	(P) Assigned Population Value (Table 4-18)	Average Stream Flow at Fishery (cfs)	(DW) Dilution Weighting Factor (Table 4-13)	(P x DW)
S.F. Bay & surrounding 2 to 3 miles	60,000 lbs	31	N/A	0.0001	0.0031
Sum (P x DW)					0.0031

Fisheries Subject to Potential Contamination = $\frac{\text{Sum (P x DW)}}{10} = \underline{0.00031}$

27. Environmental Targets

N/A

Sensitive Environment or Wetland			(A) Assigned Value (Table 4-23 and/or 4-24)	(B) Level Multiplier*	(A x B)
Length (miles)	Contaminant	Concen- tration Benchmark			
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
Sum (A x B) Level I					_____
Sum (A x B) Level II					_____

- Level I = 10
- Level II = 1

Sensitive Environment or Wetland Length (miles)	(A) Assigned Value (Table 4-23 and/or 4-24)	Average Stream Flow (cfs)	(DW) Dilution Weighting Factor (Table 4-13)	(A x DW)
le crested cormorant	none		0.0001	
ornia clapper rail	100		0.0001	0.01
snowy plover	75		"	0.0075
ornia least tern	100		"	0.01
water goby	75		"	0.0075
marsh wandering shrew	75			0.0075
marsh harvest mouse	100		"	0.01
			Sum of (A x DW)	0.0525

$$\text{Potential contamination} = \frac{\text{Sum (A} \times \text{DW)}}{10} = \underline{0.00525}$$

HRS RATIONALE

AMERICAN NATIONAL CAN COMPANY (CADO09162116)

1. FIT projects a release to groundwater since wastes are not well contained and petroleum hydrocarbons (non-CERCLA) have been released to groundwater from an on-site tank (Dames and Moore, February 16, 1990).
2. A release to groundwater indicates source migration.
3. Net precipitation factor value is 6 as taken from Figure 3-2.
4. Depth to groundwater is between 6 and 15 feet bgs (Dames and Moore Phase I, February 16, 1990).
5. The surficial stratigraphy is a fairly complex network of fluvial sands and gravels deposited non-uniformly above a marine silt and clay. Hydraulic conductivity is estimated to be 10-3 centimeters per second (cm/sec) (Workplan for American National Can Company by Dunn Geoscience).
6. The following hazardous constituents were found in groundwater near Ekotek but could be from the site:

Contaminant	Tox.	GW Mob.	Persis.		Food Chain		Bioaccum.	
			River	Lake	Fresh	Salt	Fresh	Salt
benzene	100	1	.4	.4	5,000	5,000	500	50,000
toluene	10	0.01	.4	.4	50	50	50	50
vinyl chloride	10,000	0.01	.0007	.07	5	5	5	5
meta xylene	10	.01	.4	1	500	500	500	500
2,4-dimethyl phenol	100	.01	1	1	500	500	500	500
1,1-dichloro ethane	10	1	.4	1	5	5	5	5
copper (sulfate)	100	.01	1	1	50,000	50,000	50,000	50,000
methyl iso butyl ketone	100	1	.4	1	5	5	5	5
lead	10,000	2 x 10 ⁻⁵	1	1	50	5,000	5,000	5,000
antimony	10,000	.01	1	1	.5	500	.5	500

Contaminant	Ecotox.		Air Gas	
	Fresh	Salt	Migration	Mobility
benzene	10,000	10,000	17	1
toluene	100	100	17	1
vinyl chloride	0	0	17	1
meta xylene	100	100	17	1

HRS RATIONALE (cont.)

AMERICAN NATIONAL CAN COMPANY (CADO09162116)

Contaminant	Ecotox.		Air Gas	
	Fresh	Salt	Migration	Mobility
2,4-dimethyl phenol	100	100	11	.2
1,1-dichloro ethane	0	0	17	1
copper (sulfate)	100	1,000	0	0
methyl iso butyl ketone	1	1	17	1
lead	1,000	1,000	0	0
antimony	0	0	11	1

Toxicity/mobility is 100 for several contaminants, including benzene, vinyl chloride, methyl isobutyl ketone and antimony.

7. Drummed wastes have been removed from the site in preparation for sale and closure of the property. The closure plan states that the plant's maximum capacity is 356 55-gallon drums. Even using this figure, the HWQ factor value is 1. Using wastestream quantity for the 1986 Annual report, the HWQ is 99.6 so a factor value of 100 was assigned.
8. Local groundwater is not used for drinking water.
9. The spill prevention, control and countermeasures from the DHS 1984 hazardous waste facility permit describes "paved storage areas for 55-gallon drums containing liquid material," but does not mention effective containment. A release to surface water is projected for this site as a worst case scenario.
10. FIT assumed a containment value of 10 since drums were stored outside with inadequate secondary containment.
11. The 2-year, 24-hour rainfall for Oakland is approximately 2.5 inches. Because the site is in a very urban area, it is reasonable to assume that storm sewers divert a large volume of surface water from draining onto the site. The drainage area is assumed to be less than 50 acres. Also because of the urban setting, most soil surfaces are paved and have very low infiltration rates.
12. The distance to surface water is estimated to be several hundred feet.
13. Due to the age of the facility, it is reasonable to assign a containment (flood) value of 10.
14. This site is in the 500-year floodplain. Surface water is not used for drinking water.

HRS RATIONALE (cont.)

AMERICAN NATIONAL CAN COMPANY (CAD009162116)

15. Lead has a tox/persistence of 10,000 and a food chain bioaccumulation factor value of 5,000 (salt water). Therefore, the tox/persis/bioaccumulation factor value is 5×10^7 .
16. There is a projected observed release to surface water of contaminant with a bioaccumulation factor value greater than 500. The food chain individual value is 20.
17. Copper sulfate is listed in the closure plan dated March 9, 1988. The ecotoxicity for copper in salt water is 1,000. The persistence is 1 and environmental bioaccumulation is 50,000.
18. See scoresheet component calculations worksheet.

**ENVIRONMENTAL PRIORITIES INITIATIVE
PRELIMINARY ASSESSMENT**

Purpose: RCRA Preliminary Assessment

Site: American National Can Company
3801 East 8th Street
Oakland, CA 94601
Alameda County

Site EPA ID Number: CAD009162116
TDD Number: F9-9105-019
Program Account Number: FCA1778RAA
FIT Investigators: Celia Shryne and Chris Pires
Date of Inspection: June 19, 1991
Report Prepared By: Celia Shryne *CS*
Report Date: September 19, 1991
Through: Karen Johnson *KJ*
FIT Review/Concurrence: *Karen Jadd* 9/23/91
Submitted To: Rachel Loftin
Site Assessment Manager
EPA Region IX



ecology and environment, inc.

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International Specialists in the Environment

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1. INTRODUCTION

As part of its Environmental Priorities Initiative (EPI) program, the U.S. Environmental Protection Agency (EPA) has requested Ecology and Environment, Inc.'s Field Investigation Team (E & E FIT) to conduct a Preliminary Assessment (PA) of American National Can Company located at 3801 East 8th Street, Oakland, Alameda County, California.

The EPI program integrates the Resource Conservation and Recovery Act of 1976 (RCRA), as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA) with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), in order to set priorities for cleanup of the most environmentally significant sites first. The Preliminary Assessment is conducted using CERCLA Hazard Ranking System (HRS) criteria to determine the site's eligibility for inclusion on the National Priorities List and, thus, assists in prioritizing facilities for the RCRA program.

2. SITE DESCRIPTION

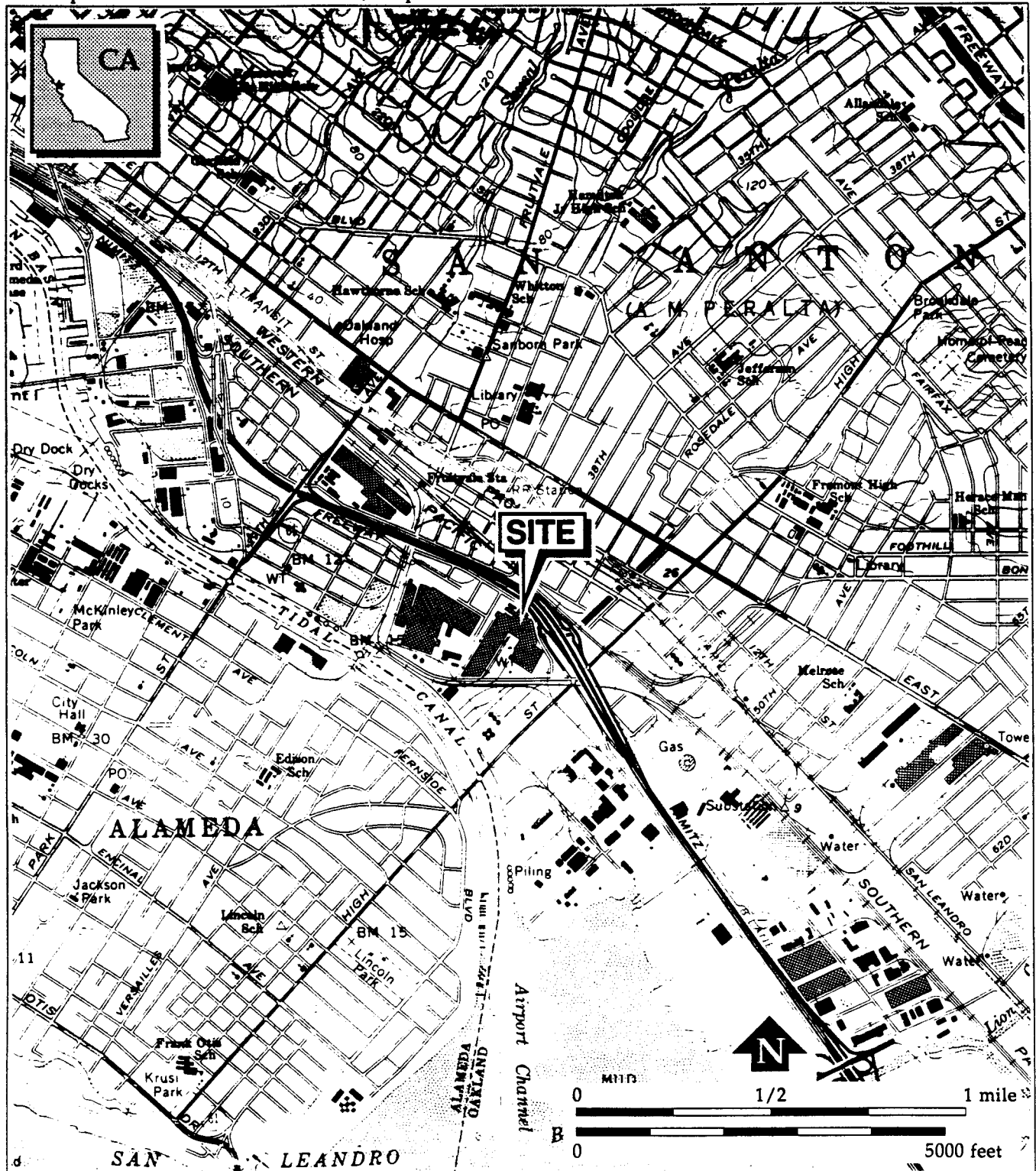
2.1 SITE LOCATION AND OWNER/OPERATOR HISTORY

American National Can Company (ANCC) is a former tin can manufacturer which is located at 3801 East 38th Street, Oakland, Alameda County, California, (T. 2 S., R. 3 W., sec. 8, Mount Diablo Baseline and Meridian; lat. 37°46'09" N., long. 122°13'21" W.) in an area of industrial, commercial, and residential development (see Figure 1) (1,2). ANCC owns most of a triangular-shaped property that is bounded on the northeast by East 8th Street and on the south by Alameda Avenue. The eastern tip of the triangle created by East 8th Street and Alameda Avenue is owned and occupied by Ekotek, a former waste oil recycling facility, which is listed in the January 1990 Update of the California Expenditure Plan for the Hazardous Substance Cleanup Bond Act of 1984 (2).

The facility building is divided into four large warehouses that each share at least one common wall; the lithograph warehouse, the coil cutting and tin plate storage warehouse, the production warehouse, and the can storage warehouse. The facility also contains a drum storage area and solder dross storage area which are separate from the warehouse (see Figure 2). In addition, a small product storage building is located south of the railroad tracks on the west side of the property. Total building space occupies approximately 560,244 square feet and the remaining property is paved (2,10).

ANCC was created from the 1987 merger between American Can Company and National Can Company. Can production began at this facility in the early 1900s (at that time American Can Company) and continued until operations were cut back in 1988. Since that time, the facility has been used for storage of cans and metal coils only (2).

base map source: USGS 1:24000 Oakland East, CA quad



ecology & environment, inc.

Figure 1
-- SITE LOCATION --
AMERICAN NATIONAL CAN COMPANY
3801 East 8th Street
Oakland, CA

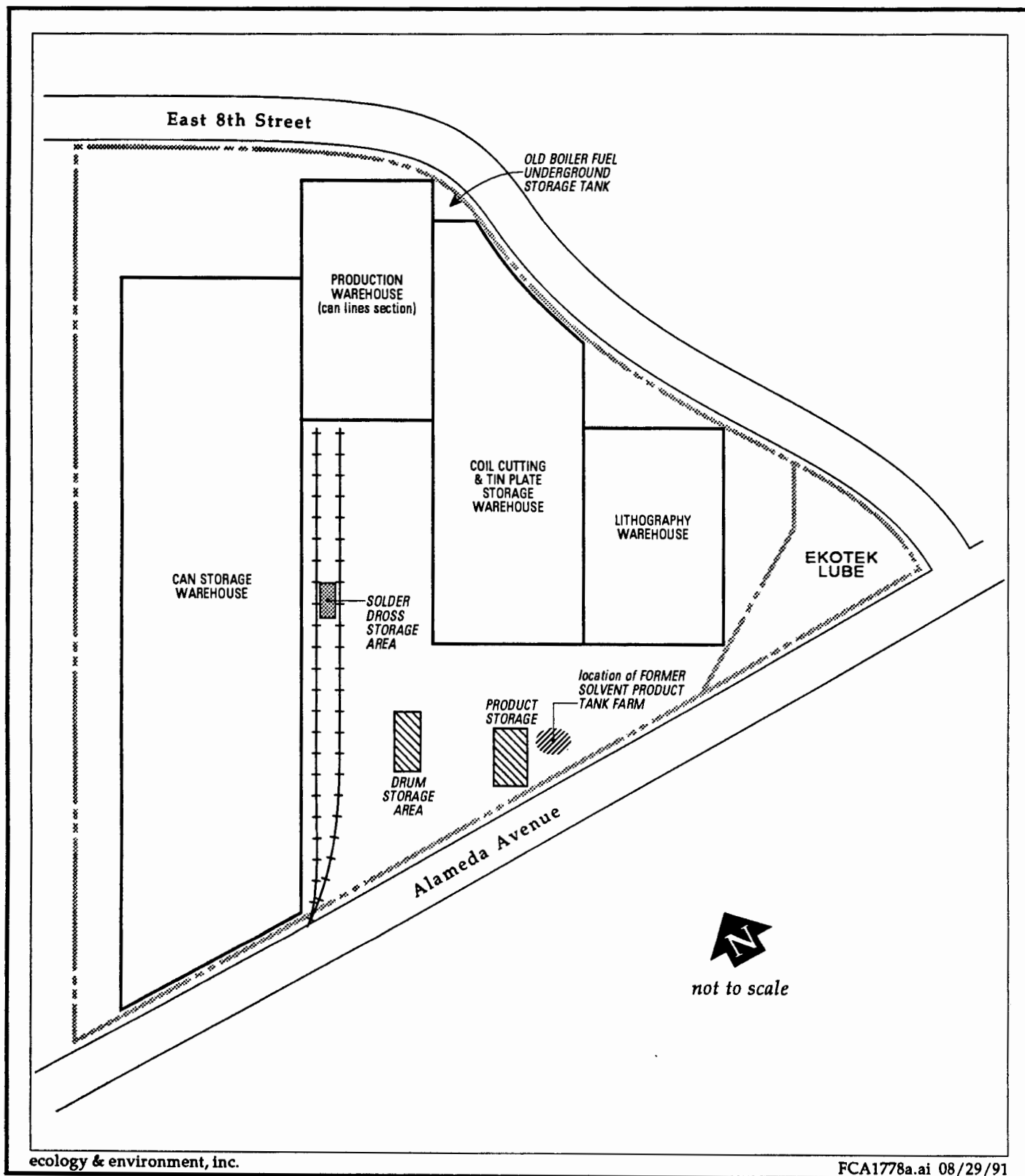


Figure 2
-- FACILITY MAP --
AMERICAN NATIONAL CAN COMPANY
3801 East 8th Street
Oakland, CA

2.2 FACILITY PROCESSES/WASTE MANAGEMENT

ANCC produced the three-piece can which consists of a metal tube and two end pieces. The process of producing three-piece cans involved several steps. Large coils of tin sheet metal were cut into a manageable size and decorated with liquid pigment (containing food-grade solvent). The sheets were then heat-treated. After heat treatment, the sheets were cut into the appropriate sizes for cans. The cut pieces were rolled and soldered with lead solder at the seam to form a tube. The inside of the can was then sprayed with a corrosion-resistant coating (containing non-chlorinated solvents) and the bottom can end was attached. The cans were not filled with product at this facility. Coffee cans were stored in the can storage warehouse at the time of the FIT site visit (2,25).

3. REGULATORY INVOLVEMENT

3.1 U.S. ENVIRONMENTAL PROTECTION AGENCY

In November 1980 American Can Company submitted Part A of a RCRA hazardous waste storage facility permit application to EPA (11). In 1981 an EPA inspector described the facility as clean (12). American Can Company resubmitted its Part A RCRA permit application in 1986 to include the storage of additional types of wastes (13). The facility is listed in the April 12, 1991 RCRA database as a hazardous waste generator, and a permitted Treatment, Storage, or Disposal Facility (TSDF).

3.2 CALIFORNIA DEPARTMENT OF HEALTH SERVICES

The California Department of Health Services (DHS) issued an Interim Status Document (ISD) for this facility in March 1981. Although it is unknown when the facility submitted its Part B permit application, DHS issued a hazardous waste facility permit in March 1984 (5,6). In 1986 DHS cited the facility for not having secondary containment for the solder dross storage area (7). ANCC submitted a closure plan for the facility to DHS in 1988. At the time of the FIT site visit, the closure plan had not yet been processed (2,8). There does not appear to be an active DHS project officer involved with this site (3,4). ANCC plans to sell the property as soon as possible. Since several years have lapsed with no action taken on the part of DHS, ANCC is proceeding with closure as specified in the closure plan (2,8).

3.3 CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD (RWQCB)

Although there appears to have been a release of boiler fuel from the site to groundwater, RWQCB has delegated investigation oversight to Alameda County Health Care Services (County Health) (9).

3.4 ALAMEDA COUNTY HEALTH CARE SERVICES

County Health has been designated by RWQCB as the lead agency, and is overseeing the investigation of groundwater contamination at this site (2,9).

4. DESCRIPTIONS OF INDIVIDUAL SOLID WASTE MANAGEMENT UNITS

Distinct Solid Waste Management Units (SWMUs) have been identified to evaluate potential on-site sources of releases to air, surface water, groundwater, soil, and subsurface gas. A SWMU is defined as any discernible waste management unit at a facility from which hazardous constituents might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste. As a result of this Preliminary Assessment, FIT has identified two significant SWMUs at the site. It is unknown if either of these units are RCRA-regulated. Additional SWMUs may exist.

4.1 DRUM STORAGE AREA

Unit Description: This unit consists of a bermed concrete pad with a design capacity of 256 drums measuring approximately 20 feet by 40 feet that is enclosed by a chain-link fence. Drums of waste solvent were formerly stored here until 1988. This unit was located outside in the yard near the product storage building (see Figure 2) (2,14).

Date of Start-up: According to the closure plan, this unit was used for hazardous waste storage beginning in September 1983 (14).

Date of Closure: This unit has not been used to store wastes since 1988 (2). ANCC submitted its closure plan to DHS in 1988 and has not yet received a response (2,8,14). Since ANCC plans to sell the property, it is proceeding with the closure plan as written. At the time of the FIT site visit no drummed wastes were present and this unit was being steam-cleaned (2).

Waste Managed: Drummed waste liquids including waste machine oil, spent solvent, paint sludge, waste hydrochloric acid solution, and waste copper sulfate (liquid) were stored here. Among the constituents in these wastes were methyl ethyl ketone, aromatic hydrocarbons, isopropanol, toluene, benzene, methanol, ethanol, copper sulfate, and hydrogen chloride (6,14).

Release Controls: This unit is a bermed (6 inches) concrete pad surrounded by a chain-link fence (2,14). A removable plug at one end of the unit was used to drain rainwater. Drums were stored within the area on wooden pallets (14).

History of Releases: No releases are known to have occurred from this unit. No sampling has been performed to determine whether or not there have been releases (2).

4.2 SOLDER DROSS STORAGE AREA

Unit Description: The solder dross storage area is a section of the concrete railroad platform that is cordoned off with a chain-link fence (see Figure 2) (2). This unbermed unit has a design capacity of approximately 100 drums and measures approximately 40 feet by 8 feet (2,14). A raised roof (no walls) affords some protection from the elements for this unit (2).

Date of Start-up: According to the closure plan, this unit was first used in 1983 (14).

Date of Closure: This unit was being steam-cleaned at the time of the FIT site visit. Although the facility is proceeding with the closure plan, DHS has not formally approved the closure plan (2).

Waste Managed: This unit was used to store drummed lead solder dross and baghouse dust which have a composition of 97 percent lead and 3 percent tin and antimony (2,14).

Release Controls: The solder dross storage area is part of a converted railroad platform. There are no apparent release controls (2).

History of Releases: No releases are known to have occurred from this unit. No sampling is known to have been performed to determine whether or not releases have occurred (2).

4.3 AREA OF CONCERN - OLD BOILER FUEL TANK

This area of concern is located on the east side of the property in a small area between the edge of the property and the building foundation. The old boiler fuel tank was installed probably before World War II. Fuel product is floating on the aquifer in this area and is being pumped out and disposed of by a contractor. This unit was filled with concrete instead of being removed because its awkward physical location (between the building foundation and East 8th Street) precluded removal (2).

4.4 AREA OF CONCERN - SOLVENT PRODUCT TANK FARM

Located on the west side of the property just south of the product storage building were six underground storage tanks that were removed in 1986 and 1987. Non-chlorinated solvents (including methyl ethyl ketone, toluene and xylene) used in the can coatings were stored in these tanks. Solvent-contaminated soil was excavated from the surrounding area during removal (2). Although according to ANCC post-removal sampling was conducted, specific information about the event does not appear to exist (2,25).

5. HRS FACTORS

The Hazard Ranking System (HRS) is a scoring system used to assess the relative threat associated with actual or potential releases of hazardous substances from sites. It is the principal mechanism EPA uses to place sites on the National Priorities List (NPL). FIT has evaluated the following HRS factors relative to this site.

5.1 WASTE TYPE AND QUANTITY

The March 1988 closure plan lists lead solder dross and baghouse dust, waste oil, spent solvent, and copper sulfate as on-site wastes. The facility's maximum inventory, which it reportedly never exceeded, was 356 55-gallon drums (14). In 1986 the facility's hazardous waste annual

report listed the following wastes and amounts (15):

<u>WASTES</u>	<u>VOLUME</u>
Solder dross	31,366 pounds
Waste oil	86,016 pounds
Coating (paint) sludge	53,200 pounds
Lacquer sludge	2975 pounds
Spent non-halogenated solvent	324,270 pounds
Asbestos	276 pounds

In addition, the closure plan lists (without giving quantities) the following wastes: waste solvent (methyl ethyl ketone, aromatic hydrocarbon, isopropanol, toluene, benzene, methanol, ethanol), lead solder dross and baghouse dust (97 percent lead and 3 percent tin and antimony), waste petroleum oil (mineral oil, mineral spirits, sulfurized lard oil, activated resin flux), waste hydrochloric acid solution (copper sulfate, hydrogen chloride, water), waste copper sulfate, coating or paint sludge (xylene, glycol ether, n-butyl alcohol, ethanol, 2-ethoxyacetate, butanol, pigments) and lacquer sludge (epoxy resin, diacetone alcohol) (14). Wastes are no longer stored on site. At the time of the FIT site visit, coils of sheet metal, finished cans, and equipment associated with can manufacture were observed on site. The drum storage area was being steam-cleaned in preparation for closure. The solder dross storage area was empty (2).

5.2 GROUNDWATER

In the vicinity of the site the land surface is underlain by approximately 6 feet of sandy/gravelly sediments and fill material. Underlying these materials are saturated, silty, sandy clay sediments termed "Bay Muds." The water table occurs approximately 5 feet below ground surface. Groundwater flows in a westerly direction (16,17,21). Groundwater is not used for drinking water in the Oakland area (18). Annual net precipitation for Oakland is 7.7 inches (19).

A release to groundwater of petroleum hydrocarbons from an old fuel tank on site has been documented. Currently a layer of petroleum hydrocarbons is floating on top of the water table and is being regularly pumped out by a contractor for ANCC. Reportedly, the thickness of the layer has decreased over time (2).

Contaminants associated with oil recycling, including polychlorinated biphenyls (PCBs), have been detected in groundwater at the south end of the property near the Ekotek facility. The Ekotek facility is listed on the 1990 Update to the California Expenditure Plan for the Hazardous Substance Cleanup Bond Act of 1984 (2,3).

5.3 SURFACE WATER

The distance from ANCC to the nearest surface water body is approximately 1,000 feet. Surface water runoff would travel through an area of industrial development to reach San Leandro Bay which is part of San

Francisco Bay (1,21). The bay water is not used for drinking. Uses of the bay include recreation, commercial and sport fishing, and wildlife habitat. Sensitive environments within 15 miles downstream of the site include wetland areas and habitats for the California clapper rail (Rallus longirostis obsoletus) and the California least tern (Sterna antillarum browni). Both are federally designated endangered species (22).

The 2-year, 24-hour rainfall for Oakland is approximately 2.5 inches (20). The site lies within a 500-year floodplain (23).

5.4 AIR

The site is within a mixed industrial/commercial/residential area, and the nearest residence is northeast directly across the street from the corner parking lot. It appears that all drummed wastes have been removed from the site or, in the case of groundwater contamination, lie beneath at least 5 feet of soil (2).

5.5 SOIL EXPOSURE

It appears that all drummed wastes stored on the site have been removed. The entire site is paved and secured with a chain-link fence. At its peak between 500 and 700 employees worked on site. Currently no more than 10 employees work on site (2).

6. SUMMARY OF FIT INVESTIGATIVE ACTIVITIES

6.1 AGENCIES CONTACTED

During its investigation of ANCC, FIT contacted DHS, Alameda County Health, and RWQCB (3,4,24).

6.2 RECONNAISSANCE OBSERVATIONS

On June 19, 1991, FIT members Celia Shryne and Chris Pires met on site with ANCC representative Judy Peters for a facility tour and informational interview. Also present was ANCC's environmental consultant, Edward Alusow, from Dunn Geoscience Corporation. Information gathered during the site reconnaissance is presented throughout this report. For additional information, refer to the Site Reconnaissance Interview and Observations Report in Appendix A and the photographs in Appendix B.

7. EMERGENCY RESPONSE CONSIDERATIONS

The National Contingency Plan [40 CFR 300.415(b)(2)] authorizes the Environmental Protection Agency to consider emergency response actions at those sites which pose an imminent threat to human health or the environment.

There is no apparent need for a referral to EPA's Emergency Response Section at this time. Groundwater remediation at the site is currently being conducted under the direction of Alameda County Health Care Services. The site appears adequately secured from public access by a

chain-link fence. Drummed wastes have been removed from the site in preparation for closure and eventual sale of the property (2).

8. SUMMARY OF HRS CONSIDERATIONS

The American National Can Company site is located at 3801 East 8th Street in Oakland, California. The facility manufactured three-piece cans from the early 1900s until 1988. Waste solvents and lead solder dross were produced during facility operations. Currently the facility is only used for can storage. The entire site is paved and surrounded by a chain-link fence. American National Can Company has begun closure activities as detailed in the closure plan it submitted to the California Department of Health Services. The agency has made no response regarding the closure plan in the three years since it was submitted by the facility.

Groundwater contamination with petroleum fuel exists at the site. Alameda County Health Care Services is overseeing groundwater remediation activities. Immediately south of the site is the Ekotek facility, a former waste oil recycling facility that has been listed on the January 1990 Update to the California Expenditure Plan for the Hazardous Substance Cleanup Bond Act of 1984.

The following are significant Hazard Ranking System factors associated with the American National Can Company site:

- o Although groundwater contamination has been documented at the site, groundwater is not used for drinking within 4 miles of the site;
- o Apparently all drummed wastes stored on site have been removed; and
- o Surface water in the vicinity of the site is not used for drinking water.

9. EPA RECOMMENDATION

	<u>Initial</u>	<u>Date</u>
No Further Remedial Action Planned under CERCLA	_____	_____
Higher-Priority SSI under CERCLA	_____	_____
Lower-Priority SSI under CERCLA	_____	_____
Defer to Other Authority (e.g., RCRA, TSCA, NRC)	<u>ra</u>	<u>10.21.91</u>
Notes:		

10. REFERENCES

1. U.S. Geological Survey, maps of Hunter's Point, Oakland East, Oakland West and San Leandro, California, 7.5-minute quadrangles, 1959 (photorevised 1980).
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3. Chapman, Cynthia, Alameda County Health Care Services (County Health), and Celia Shryne, E & E FIT, telephone conversations, May 30 and June 6, 1991.
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12. Jackson, Susi, U.S. Environmental Protection Agency (EPA), Part A Rating Sheet for American Can Company, April 20, 1981.
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17. Mittelhauser Corporation, "Site Investigation and Remediation at Bedford Properties - Oakland Site", June 1989.
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21. Dames & Moore, "Phase I Environmental Site Investigation, ANCC, Oakland, California," February 16, 1990.
22. State of California, Department of Fish and Game, "Natural Diversity Database--RareFind," Oakland West and Oakland East, California, quadrangles, October 1, 1990.
23. Lera, Janice, Army Corps of Engineers, and Celia Shryne, E & E FIT, telephone conversation, June 17, 1991.
24. Gandesbury, Tom, California Regional Water Quality Control Board, and Celia Shryne, E & E FIT, telephone conversation, June 3, 1991.
25. Peters, Judy, ANCC, and Celia Shryne, E & E FIT, telephone conversations, May 30 and August 9, 1991.

APPENDIX A
CONTACT LOG AND REPORTS

CONTACT LOG

Facility Name: American National Can Company
Facility ID: CAD009162116

Name	Affiliation	Phone #	Date	Information
Patti Paul	East Bay Municipal Utilities District	415-891-0615	3-8-90	The water supply for the Oakland area is imported from the Mokelumne Watershed. No local groundwater wells are used for drinking water.
Doris Cruz	DHS File Room	415-540-2122	5-29-91	FIT will FAX Ms. Cruz a written request for file information at 415-540-3738.
John Pagnini	American Nat'l Can Co.	415-536-2401	5-30-91	The facility operations moved from Oakland to San Leandro 2 years ago. The Oakland location is used for office and warehouse space now. He referred FIT to the plant manager or the San Leandro facility at 415-895-4701.
Cynthia Chapman	Alameda County Health Care Services	415-271-4320	5-30-91 6-6-91	See Contact Report.
Judy Peters	ANCC	415-399-3162	5-30-91 8-9-91	See Contact Report.
Tom Gandesbury	RWQCB Region 2	415-464-1255	6-3-91	RWQCB has a file on the site, but FIT must visit the RWQCB office to review it. Free product has been found floating on top of the aquifer.
Don Cox	DHS	415-540-3804	6-3-91	Mr. Cox knows of no project officer from the Site Evaluation Unit who is involved with the site.

CONTACT LOG (cont.)

Facility Name: American National Can Company
Facility ID: CAD009162116

Name	Affiliation	Phone #	Date	Information
Janice Lera	Army Corps of Engineers	415-744-3362	6-17-91	ANCC is in Zone C which is the 500-year floodplain.
Judy Peters	American National Can Company	312-399-3162	6-19-91	Site Reconnaissance Interview and Observations Report.
Matthew McCarron	DHS	415-540-3739	9-16-91	Mr. McCarron searched his files. No one in Permitting or Surveillance and Enforcement is currently assigned to the site. Records show "backlog of request" with respect to the facility's closure plan. There is no indication that DHS has made a response to the closure plan.
Vern Christianson	EPA	415-744-2422	9-17-91	ANCC's Part B is not maintained in EPA's files.

CONTACT REPORT

AGENCY/AFFILIATION: Alameda County Health Care Services		
DEPARTMENT: Department of Environmental Health		
ADDRESS/CITY: 80 Swan Way, Room 200, Oakland		
COUNTY/STATE/ZIP: Alameda County, California 94621		
CONTACT(S)	TITLE	PHONE
1. Cynthia Chapman	Hazardous Material Specialist	415-271-4320
2.		
E & E PERSON MAKING CONTACT: Celia Shryne		DATE: 5-30-91 6-6-91
SUBJECT: Background information		
SITE NAME: American National Can Company		EPA ID#: CAD009162116

5-30-91:

RWQCB initiated the preliminary investigation of the site (i.e., a report by Dames and Moore). The facility has been dismantled. There are two hazardous waste storage areas: the lead solder dross storage area and the drum storage area. Tom Gandesbury is the RWQCB contact.

6-6-91:

Alameda County Health is the lead agency regarding the groundwater remediation at the site. Ms. Chapman is concerned about two areas: the groundwater monitoring wells adjacent to the Ekotek site (former waste oil recycling facility that is listed on the Bond Expenditure Plan) that have been detecting PCBs, and Well No. 6 which is picking up free floating fuel product near the old boiler fuel underground storage tank. Well No. 6 is located on the East 8th Avenue side of the property. The old boiler fuel underground storage tank was closed in place because it was too difficult to remove.

Currently, cans are stored in the can storage warehouse. In the past the facility painted the cans using solvents and paints and assembled the cans using lead solder. Now the facility is used only for storage.

CONTACT REPORT

AGENCY/AFFILIATION: American National Can Company		
DEPARTMENT: Environmental Engineering Department		
ADDRESS/CITY: Chicago		
COUNTY/STATE/ZIP:		
CONTACT(S)	TITLE	PHONE
1. Judy Peters	Environmental Manager	312-399-3162
2.		
E & E PERSON MAKING CONTACT: Celia Shryne		DATE: 5-30-91 8-9-91
SUBJECT: Background information		
SITE NAME: American National Can Company		EPA ID#: CAD009162116

5-30-91:

Site remediation is in progress. Cynthia Chapman of Alameda County is overseeing the work. Underground storage tanks used to store virgin materials (fuel and solvents) have been removed. Ekotek, a California Superfund site, is immediately adjacent to the site. Monitoring wells have been installed over the past two years. A recovery well is pumping free petroleum product from the top of the aquifer. June 17, 1991 is the tentative date of the site reconnaissance.

8-9-91:

The sheet metal used to make cans was usually tin plate. Can decorating involved the application of liquid pigments (containing food-grade solvents) and then heat treatment. There is one recovery well on site near the old boiler fuel tank. Petroleum product that is pumped out is disposed of off site by a contractor. All gross contamination was removed from the solvent product tank farm, but Ms. Peters doesn't remember to what contaminant level the area was excavated. Currently the only function of the ANCC site is for can storage.

SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT

Ecology and Environment, Inc.		
Field Investigation Team (FIT)		
160 Spear Street, Suite 1400		
San Francisco, California 94105		
(415) 777-2811		
E & E PERSON(S) CONDUCTING INTERVIEW AND MAKING OBSERVATIONS:		
Celia Shryne and Chris Pires		
FACILITY REPRESENTATIVE(S):	TITLE:	PHONE:
Judy Peters	Environmental Manager	312-399-3162
SITE NAME: American National Can Company		DATE: 6-19-91
CITY/STATE: Oakland, California		EPA ID#: CAD009162116

This facility has been in operation at this location since the early 1900s. American Can Company owned and operated this facility until 1987 when it merged with National Can Company to create American National Can Company (ANCC). This facility was actively producing cans until 1988 when facility operations were cut back. It is now used for storage only. When fully operational, this facility manufactured three-piece cans. The process of manufacturing three-piece cans involved decorating (not inking) large sheets of metal, then cutting the metal sheets into the proper sizes. The cut pieces were rolled and soldered (using lead) at the seam to form a tube. The inside of the can was sprayed with a corrosion-resistant coating (containing some non-chlorinated solvents) and the can ends were attached. At its peak of operation, approximately 500 to 700 employees worked at this facility. Now no more than 10 people work on site at any one time. Several of these employees are truck drivers.

Types of hazardous materials present during the operation of this facility include:

- o coating materials (water, pigments, non-chlorinated solvents)
- o machinery oil
- o solder bars containing lead and tin

- o gasoline
- o solvents and thinners for coatings and cleaning (methyl ethyl ketone, toluene, xylene).

The coating materials contained food-grade materials; no heavy metals and no chlorinated solvents. A total of eight underground storage tanks existed at this site. All underground storage tanks on site were used to store product. Six solvent tanks located near the product storage building adjacent to Alameda Avenue were removed in 1987 by Aqua Tech. Solvents were detected in soil near the tanks. One 15,000-gallon boiler fuel underground storage tank located adjacent to East 8th Street was closed in place by Dunn Geoscience in 1987. Free floating product is being pumped from the surface of the water table. One 500-gallon gasoline underground storage tank located adjacent to 37th Avenue was removed in 1990 under the direction of Alameda County Health Department. No contaminants were detected in soil near the gasoline tank.

It is possible that some chlorinated solvents were used for cleaning. Wastes generated included:

- o waste solvent sent to Romic Chemical
- o waste coatings probably sent to Romic Chemical
- o waste oil sent to Solvent Service for recycling
- o waste solder sent to Summer Chemical in Richmond, CA.

Sometimes the waste drums of solvent would contain sludge which was unusable for Romic Chemical, so the sludge was shipped to Chemical Waste Management's Kettleman Hills facility (EPA ID# CAT000646117). ANCC is in the process of closing the two hazardous waste storage areas--the waste solvent storage area and solder dross storage area. ANCC submitted a closure plan to DHS in 1988. Since DHS had not responded to the closure plan and ANCC plans to sell this property as soon as possible, the facility has begun to proceed with the closure plan as written. Most records for this facility are either in storage or were thrown out since common practice in the industry was to keep them for no more than three years.

Ms. Peters knows of no fires or spills that have occurred on site. Dames and Moore installed five monitoring wells in 1989. At that time one monitoring well was discovered on site, yet no records regarding this monitoring well are known to exist by Ms. Peters. In March 1991 Dunn Geoscience installed 13 monitoring wells on site. Although the wells have been sampled, the data were not available at the time of the site visit. This facility has a National Pollutant Discharge Elimination System (NPDES) permit for a drinking fountain that drained to the storm sewer instead of the sanitary sewer.

Essentially, this facility is one very large building which began as a warehouse. After many years of operation and many additions, the on site building is now very large.

Southeast of ANCC and located at the juncture of Alameda Avenue and East 8th Street is an inactive waste oil and solvent recycling facility named Ekotek. Ekotek is listed as a California Superfund site. According to Ms. Chapman, there may be underground storage tanks at Ekotek that are leaking PCBs and other contaminants into the groundwater. At the time of the site visit, Dunn Geoscience was in the midst of conducting a soil gas survey on ANCC property bordering Ekotek.

SWMUs identified during the reconnaissance are the solder dross storage area and the drum storage area. Drummed solder dross was stored here. This SWMU consists of a section of the old railroad platform (concrete) sectioned off with cyclone fencing. It measures approximately 20 feet by 20 feet. The drum storage area was also installed in approximately 1980. This SWMU consists of a bermed concrete pad measuring approximately 40 feet by 8 feet surrounded by cyclone fencing. Drums of waste solvent were stored here. The hazardous waste storage area was being steamed cleaned in preparation for closure at the time of the site visit.

Two areas of concern were identified during the reconnaissance--the old boiler fuel underground storage tank and the old product solvent underground storage tanks. The old boiler fuel 15,000-gallon underground storage tank was installed probably before World War II. It is located on the east side of the property in a small area between the edge of the property and the building foundation. Because of difficulties associated with removing the tank from such a confined area, this tank was filled with concrete instead of being removed. A layer of product several feet deep was discovered floating on top of the water table and is currently being pumped out by Dunn Geoscience Corporation. Cynthia Chapman of Alameda County Health Care Services thinks the boiler fuel is essentially trapped in this small area. The depth of the floating layer has been decreasing over time.

Six old product solvent underground storage tanks were located on the west side of the property just south of the product storage building. They were used to store non-chlorinated solvents used in the can coatings. The tanks were removed by Aqua Tech in 1987 and 1988. During the tank removal, solvents were detected in the surrounding soil. Contaminated soil was excavated.

The building itself consisted of four separate sections. At the southern end of the property is the lithography section which still houses most of the old equipment. Large sections of sheet metal were decorated with the appropriate company name and product identification. Directly north of the lithography section is the coil cutting and tin

plate storage warehouse. Just north of that is the can lines section, or production warehouse, where the proper sized flat metal pieces were rolled and soldered. The solder was comprised of lead and tin. Solder dross is solder mixed with dirt which gets skimmed off the top of the molten solder. North of the production warehouse is the can warehouse where finished cans are stored on wooden pallets. Hills Bros. and Folgers coffee cans were stored in the can storage warehouse at the time of the FIT site visit.

APPENDIX B
PHOTODOCUMENTATION

FIELD PHOTOGRAPHY LOG SHEET

DATE: 6-19-91

TIME: 10:00 AM

DIRECTION:

south

WEATHER: _____

warm, sunny

PHOTOGRAPHED BY:

Celia Shryne



DESCRIPTION:

The drum storage area was being steam cleaned at the time of the FIT site visit.

DATE: 6-19-91

TIME 10:15 AM

DIRECTION:

northwest

WEATHER: _____

warm, sunny

PHOTOGRAPHED BY:

Celia Shryne



DESCRIPTION:

The solder dross storage area has a concrete floor surrounded by chain-link fence.

cs/can/fpls

FIELD PHOTOGRAPHY LOG SHEET

DATE: 6-19-91

TIME: 10:30 AM

DIRECTION:

south

WEATHER: _____

warm, sunny

PHOTOGRAPHED BY:

Celia Shryne



DESCRIPTION:

The Ekotek facility, listed on the January 1990 Update to the California Expenditure Plan for the Hazardous Substance Cleanup Bond Act of 1984, is located immediately south of the site.

DATE: 6-19-91

TIME 11:00 AM

DIRECTION:

north

WEATHER: _____

warm, sunny

PHOTOGRAPHED BY:

Celia Shryne



DESCRIPTION:

The nearest residence is located approximately 20 feet north of the property.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, Ca. 94105**

Certified Mail # P 887 519 574
Return Receipt Requested

In Reply Refer to: H-4-4
EPA ID # CAD 009 162 116

Ms. Judy Peters
American National Can Company
Mail Suite 04D
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631-3504

Dear Ms. Peters:

Ecology and Environment, Incorporated has completed a Preliminary Assessment (PA) of American National Can Company on behalf of the Environmental Protection Agency (EPA). During this investigation, Ecology and Environment, Incorporated gathered information in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA) of 1976. A copy of the PA report is enclosed for your records.

Please note that EPA has withheld Section 9, the EPA Recommendation Section from you as EPA considers this section to contain enforcement confidential information. This section is exempt from the mandatory disclosure requirements, as provided in 40 C.F.R. Section 2.118 (a) (5), as matters that are inter-agency or intra-agency memoranda or letters which would not be available by law to a party other than an agency in litigation with the agency; or as provided in 40 C.F.R. Section 2.118(a) (7) (A), as matters that are records or information compiled for law enforcement purposes, but only to the extent that the production of such enforcement records or information could reasonably be expected to interfere with enforcement proceedings.

EPA routinely provides copies of investigation reports to State agencies, and upon request, to the public. EPA handles such releases according to the regulations governing business confidentiality claims (40 C.F.R. Part 2). You should make any claim of confidentiality within fifteen (15) working days of the receipt of this letter. EPA will construe a failure to furnish a timely claim as a waiver of the confidentiality claim. Any claim of confidentiality should identify the specific pages or portions of pages of the PA report which are considered confidential and should also give a detailed explanation of the basis for such a claim.

If you have any further questions regarding this report,
please contact me at (415) 744-2043.

Sincerely,

Nancy J. Nadel
RCRA Corrective Action Section

Enclosure

cc: Don Cox, DHS TSCP
Steve Morse, CAL RWQCB
Edward W. Alusow, Dunn Geoscience Corporation

R E P O R T T R A N S M I T T A L

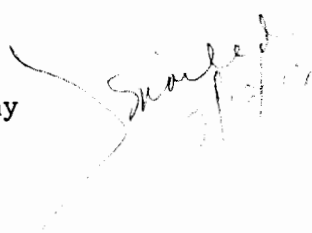
Date delivered to H-8-1: 9-24-91

Copies of this EPI PA for American National Can Company should be sent to the following agencies or individual(s):

CA RWQCB
San Francisco Bay Region
2101 Webster St. 5th Floor
Oakland, CA 94612
Attn: Steve Morse, Exe Offc

CA Department of Health Services TSCP
Site Mitigation Branch, Site Evalaution Unit
2151 Berkeley Way, Annex 9
Berkeley, CA 94704
Attn: Don Cox

Judy Peters
American National Can Company
Mail Suite 04D
8770 West Bryn Mawr Avenue
Chicago, IL 60631-3504



Edward W. Alusow
Dunn Geoscience Corporation
12 Metro Park Road
Albany, NY 12205



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

NCA-1
m

MEMORANDUM

DATE: February 28, 1992
SUBJECT: Preliminary Assessment Review
Facility: American National Can Company PA date: 9/19/91
FROM: Frank R. Gardner
TO: Karen Schwinn
Chief, Waste Compliance Branch
THROUGH: Chief, Corrective Action Section

I. FACILITY DESCRIPTION

Facility Name: American National Can Company

Address: 3801 East 8th Street
Oakland, CA 94601
Alameda County

EPA ID Number: CAD 009 162 116

DTSC Region (if CA): 2

RWQCB Region (if CA): 2

I. FACILITY DESCRIPTION (cont.)

A. Brief Description of Facility Operations and Hazardous Waste Management: The American National Can Company (ANCC) used this facility for the manufacture of metal cans from approximately 1900 to 1988. These cans (known as "three piece cans") were constructed from a metal tube and two end pieces which were soldered into place. From January 1989 to the present, the facility has been used only for the storage of cans and metal coils. The main building on the site is divided into four sections: the lithograph warehouse, the coil cutting and tin plate storage warehouse, the production warehouse, and the can storage warehouse. The facility also contains a small product storage

building, a solder dross storage area, and a drum storage area. The entire site is paved.

Adjacent to this facility and to the east is the Ekotek site, a former waste oil recycling site which is listed on the California Expenditure Plan for the Hazardous Substance Cleanup Bond Act of 1984 (California Superfund). However, according to Frank Gaunce of DTSC's Site Mitigation Branch, Ekotek is not a high priority site and is currently on backlog. Therefore, DTSC currently has no activities occurring at Ekotek.

Wastes generated by ANCC included lead solder dross, waste machine oils, baghouse dust, spent solvents (MEK, toluene, xylene), paint sludges, waste hydrochloric acid, and waste copper sulfate. These wastes were managed in two SWMUs: (Regulated Units are starred with an asterisk.)

- 1) *Drum Storage Area (assumed >90 days, 1983-1988)*
- 2) *Solder Dross Storage Area (assumed >90 days, 1983-1988)*

The PA did not identify either SWMU as being a Regulated Unit (RU). However, based on the limited information presented, it appears that both SWMUs are RUs.

In addition, two Areas of Concern (AOCs) have been identified:

- 3) Former Boiler Fuel Tank (pre 1940 to 1987, 15,000 gallon UST)
- 4) Former Solvent Product Tank Farm (pre 1987, 6 USTs)
- 5) Former Resin Tank (4,000 gallon UST)
- 6) Former Gasoline Tank (pre 1990 ? UST)
- 7) Former Steam Cleaning Area
- 8) Ekotek Facility (adjacent CA Superfund site)

B. SWMU and AOC Release Inventory:

The following is a table of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) releases and release potential to the various media. Releases are described with either a "D" for Documented, a "V" for Visual, or a "P" for Potential. Potential releases are further characterized as "H," "M," or "L" for High, Medium and Low. RCRA-regulated units are starred with an asterisk.

Unit #	Name	Soil	GW	SW	Air
1	*Drum Storage Area*	D	PH		
3	Former Boiler Fuel Tank	V	V		
4	Former Solvent Product Tank Farm	D	D		
7	Former Steam Cleaning Area	D	PH		
8	Ekotek Facility	D	D		

II. ENVIRONMENTAL SIGNIFICANCE:

A. Hazardous Waste Exposure and Constituent Information

Instructions:

1. Designate as appropriate: D - documented evidence (e.g. analytical data), V - visual evidence (e.g. observed spills, stained soils, etc.), P -potential for release. Specify documentation, who saw visual evidence, and/or rationale for potential release, if known.

2. Provide released or potentially released listed waste or constituent information to each appropriate media. Include volume of waste released, if known, toxicity, and physical state of contaminants.

3. Indicate whether release has already been remediated.

4. Stabilization is appropriate if:

- there are actual or imminent exposure threats to humans or ecosystems at levels of concern;
- inexpeditiously addressed releases will result in further significant contamination; or
- site characteristics suggest that the site may be amenable to control or abatement of imminent threats.

_____ Imminent danger to public health/environment.
Immediate action required; explain:

_____ Stabilization measures appropriate; explain:

D,PH Release to soil. D V P

UNIT	CONSTITUENT	CONC. (ppb)	ACTION LVL	TOXICITY
SWMU 1	Ethylbenzene	320	8,000,000	9
SWMU 1	Xylenes	4,300	2E+08	9
AOC 4	Ethylbenzene	2,500	8,000,000	9
AOC 4	Xylenes	5,100	2E+08	9
AOC 7	Toluene	10	2E+07	9
AOC 7	TPH	3,200,000	N/A	N/A
AOC 7	Xylenes	3	2E+08	9
AOC 8	Benzene	13	N/A	12
AOC 8	Ethylbenzene	370	8,000,000	9

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AOC 8	Toluene	13	2E+07	9
AOC 8	TPH	1,560,000	N/A	N/A
AOC 8	TCE	120	60,000	12
AOC 8	Xylenes	650	2E+08	9

SWMU 1 (documented soil release): Soil samples collected by Dames & Moore in 1990 at the Drum Storage Area at a depth of 2.25 feet contained VOC contamination as described above. The facility may have begun some remediation of this release during closure activities. According to the recently submitted closure certification report, this SWMU has been clean-closed and no contamination exists here. This apparent discrepancy may be due to either insufficient closure sampling or to sampling of a different, and as of yet unidentified, drum storage area.

AOC 3 (potential soil release): Free product is floating on the ground water at the Former Boiler Fuel Tank. Therefore, the soils that contain this free product must be contaminated. This free product is being pumped out by a contractor to ANCC, and its depth has decreased over time due to this remediation.

AOC 4 (documented soil release): Dames & Moore documented the presence of soil contamination associated with the Former Solvent Product Tank Farm to a depth of at least 9 feet in 1990 as indicated above. Some removal of contaminated soils was reported to have occurred during removal of the tanks in this tank farm.

AOC 7 (documented soil release): Stained surface soils were noted in the Former Steam Cleaning Area in a 16 February 1990 site investigation report prepared for the facility by Dames & Moore. Contamination in these soils was documented by Dames & Moore in 1990 as indicated in the above table. No remediation is known to have occurred relative to this release.

AOC 8 (documented soil release): Dames & Moore documented soil contamination to a depth of at least 15 feet in this area in 1990 as indicated above. Apparently, this soil contamination is related to the GW contamination migrating onto this site from the Ekotek Superfund site. No known remediation of this area has been conducted. It is hoped that this contamination will be addressed along with the Ekotek site.

D Release to groundwater. D V P

UNIT	CONSTITUENT	CONC. (ppb)	ACTION LVL	TOXICITY
AOC 4	TPH	39,000	N/A	N/A
AOC 4	Xylenes	8,000	70,000	9
AOC 8	Benzene	380	5	12
AOC 8	2,4-Dimethylphenol	9,000	400 CA	N/A
AOC 8	4-Methylphenol	2,600	N/A	N/A
AOC 8	Toluene	580	100 CA	9
AOC 8	TPH (Gasoline)	40,000	N/A	N/A
AOC 8	Vinyl Chloride	280	2	15
AOC 8	Xylenes	620	1750 CA	9

SWMU 1 (potential GW release): Since soil contamination has been documented at this SWMU, it is possible that ground water contamination has also resulted. Due to the very high ground water table and the granular nature of site soils, the probability of this ground water release is very high. (See comment regarding clean closure under "Release to Soil", above.)

AOC 3 (visual GW release): Free product is floating on the ground water table at the Former Boiler Fuel Tank. It is almost certain that ground water has been contaminated by this release. This release is being remediated by the removal of free product via a recovery well.

AOC 4 (documented GW release): Ground water monitoring in the area of the Former Solvent Product Tank Farm by Dames & Moore in 1990 revealed the presence of ground water contamination as indicated above. No known remediation of this release has been conducted to date.

AOC 7 (potential GW release): Due to the soil contamination documented by Dames & Moore in 1990 to a depth of at least 3.75 feet at the Former Steam Cleaning Area, it is likely that ground water has also been contaminated in this area given the very high ground water table and the granular nature of site soils.

AOC 8 (documented GW release): Contaminated ground water is migrating on site from the adjacent, upgradient, California Superfund site known as Ekotek, as indicated in the above table. Also detected here in ground water by Dames & Moore in 1990 were arsenic, cadmium, chromium, and nickel above MCLs. No ground water

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remediation is known to have been conducted to date in this area. It is assumed that this contamination is being addressed along with the Ekotek Superfund site.

_____ Release to surface water. D V P

_____ Release to air. D V P

 X High Potential for Migration (media: soil)
The site is underlain with six feet of gravelly fill, and ground water occurs at a depth of only 8-15 feet.

 X Sensitive environmental receptors onsite or within 3 miles (endangered species, wetlands, etc.) Explain: San Francisco Bay, approximately 1,000 feet away, supports at least two federally endangered species:

- California Clapper Rail (Rallus longirostris obsoletus)
- California Least Tern (Sterna antillarum browni)

_____ No releases

Extent of Site Characterization (check one):

 X minimal _____ extensive _____ unknown

B. Exposure Considerations: (D - Documented, P - Potential)
Skip this section if there is no potential or documented release.

1. Groundwater (GW): If potential exposure is a concern, please specify whether release is "highly suspected" (HS). A highly suspected release to groundwater means that there is known soil contamination from a large volume of mobile constituents with high migration potential where there is no known aquiclude between contaminated soil and ground water.

 no Current GW drinking water source impacted

 no Sole Source (Class I) aquifer impacted

 no Impacts on potable water aquifer but not currently used as drinking water

Depth to GW 5-10' GW flow direction west

Direction/Distance to nearby wells no nearby wells

Population Served N/A

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2. Surface Water (SW):

no SW drinking water source impacted

Direction/Distance to SW 1,000 to the west

1,000 Distance to sensitive environment related to SW contamination

no Distance to drinking water supply intake or contact point

Net Precipitation 7.7" 24 hour rainfall 2.5"

Permitted outfall no Permit Violations no

no Flood prone area no 100-yr flood plain

? Fishing, recreation water source impacted
The potential exists for GW contamination from this site to impact San Francisco Bay, 1000 feet west (and downgradient) of the site.

no Irrigation, livestock water source impacted

The following near coastal waters and Estuary factors should not be considered in the initial staff prioritizing process. The information will be considered by management with the recommendation.

Check if contamination affects any of the following near coastal waters:

- Apra Harbor (Guam)
- Babelthaup Island Bays (Palau)
- Kaiaka Bay (Hawaii)
- Kailua Bay (Hawaii)
- Kona Coast (Hawaii)
- Morro Bay (California)
- Pago Pago Harbor (American Samoa)
- Pearl Harbor (Hawaii)
- San Diego Bay (California)
- Tijuana Estuary (California)

Check if contamination affects either of these Estuary projects:

- X San Francisco Bay/Delta
- Santa Monica Bay

3. Air:

- no Blowing dust; nearby population
no Air permits no Permit violations
no Can contaminants migrate into air?
X Target Population < 4 miles (# and distance)
(not specified in the PA)

4. On site:

- Accessibility: inaccessible X
limited access _____
poor security _____

X Observed surface soil contamination - (See discussion of the Former Steam Cleaning Area in Section II.)

III. SITE ENVIRONMENTAL PRIORITY

Instructions: Assign priority based on technical considerations only. Final priority should be briefly explained in terms of potential exposure to human health and the environment based on the technical considerations in Sec. II.

_____ High Priority

* Known or highly suspected release which has resulted in, or which has high potential for, exposure to human population and sensitive environments (other than near coastal waters and estuary project sites), in the short term (< 10 years). Choose this priority if there is known or highly suspected contamination to a sole source aquifer currently being used.

NCS agrees X Medium Priority

* Known or highly suspected release with potential for exposure to human health and sensitive environments (other than near coastal waters and estuary project sites) in the long term (> 10 years).

_____ Low Priority

* Known or highly suspected release, but unlikely adverse effect on human health and the environment.

No Further Action

* No evidence of a release that could adversely affect human health and the environment.

Comments/Rationale to support priority: This site has several releases to soil and ground water from several SWMUs and AOCs. Although risk to human health is unlikely since the entire site is paved and the ground water is not used for drinking water, the site is only 1,000 feet upgradient from San Francisco Bay, a sensitive wetland environment that supports at least two endangered species.

IV. RCRA PERMITTING STATUS

A. Contact Person(s):

#	Name	Contact Date	Phone	Agency
1	Vern Christianson	9/17/91	415/744-2422	EPA-Permits
2	David Wampler	9/16/91	510/540-3861	DTSC

B. Current Status (mark all applicable):

Instructions: For source, indicate file document or numeral for contact person listed above.

 X Operating RCRA TSDF; Source: 2

 Not Operating RCRA TSDF; Source:

 Bankrupt Facility; Source:

 Non-Notifying TSDF - should be a RCRA TSDF but didn't submit a Part A permit application. Source:

 Generator only - never operated as a TSDF. Source:

 X Permitted TSDF or Seeking Permit; Source: EPA files

Date Permitted: 3/13/84

Agency: DHS

Permit Application Review Lead (circle)

EPA

 STATE

OTHER (specify)

Corrective Action in Permit? Y N

Permit Issuance Date: 3/13/84

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Permit Expiration Date: 3/13/89

Permit Renewal Application Submitted Y N

X Closed or Closing Facility; Source: EPA files

Closure Plan Submittal Date: 2/3/83

Closure Plan Review Lead (circle all applicable):
EPA STATE OTHER (specify)

Closure Plan Approved? Y N Date: 3/13/84

Closure Certification Received? Y N
(dated 11/21/91)

Clean Closed? Y N (appears to conflict with Dames & Moore sampling report dated 2/16/90, see Section II.)

Closure Certification accepted by EPA/DTSC? Y N
(pending incorporation of DTSC comments)

_____ Post-Closure permit; Source:

_____ Combination: some units closing, some seeking permit (i.e. partial closure). Source:

_____ Part A Withdrawal Candidate; Source:

_____ RWQCB Waste Discharge Requirements requiring investigation and/or remediation in Effect (CA only)

V. OTHER REGULATORY ACTIVITIES RELEVANT TO CORRECTIVE ACTION

A. Contact Person(s):

#	Name	Contact Date	Phone	Agency
3	Frank Gaunce	2/28/92	510/540-3834	DTSC-Site Mit
4	Dennis Burns	2/24/92	510/271-4320	Alameda Co
5	Tom Gandesbury	2/28/92	510/464-1255	RWQCB
6	Judy Peters	8/9/91	510/399-3162	ANCC

B. Activity

Instructions: mark all applicable; note any pertinent outstanding violations.

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- _____ EPA Enforcement Action with Activities Relevant to
Corrective Action; Source:
- _____ State Enforcement Action with Activities Relevant to
Corrective Action; Source:
- _____ Regional Water Board Order or WDR Requiring Corrective
Action (CA only); Source:
- X Other Agency Enforcement Action with Activities
Relevant to Corrective Action; Source: 4

Date:

Explain: Alameda County Health Care Agency is overseeing the remediation of the release at AOC 3, the Former Boiler Fuel Tank. As a result, the facility has been removing free product from the ground water table. This remediation is appearing to be effective, as the thickness of this floating product has been decreasing over time. Dennis Burns is the contact at Alameda County who oversees the site. He is very difficult to reach, and I was not able to speak to him directly. He must be contacted during the RFA to determine the status of the site.

VI. OVERALL STATE LEVEL OF INVOLVEMENT IN CLEAN-UP ACTIVITIES
(based on state actions, level of state staff person's oversight)

Mark one:

_____ High _____ Medium _____ Low X None

Rationale: The state has not been involved in the very limited remedial activities to date. In addition, DHS has had the facility's closure plan in their possession for three years but has not yet reviewed it due to backlog. The facility has had to proceed with closure activities without first gaining approval of the closure plan.

VII. FACILITY WILLINGNESS/ABILITY TO PERFORM CORRECTIVE ACTION

 X Facility is cooperative, (based on their apparent cooperation with the county health department)

_____ Facility is uncooperative

_____ Unknown

_____ Facility may be financially unable to complete work.

VIII. RECOMMENDATION FOR FURTHER ACTION (mark all applicable)

Instructions: Consider factors in Sections I - VII to arrive at final recommendation for further action. If several

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actions are recommended, prioritize as Action 1, 2, etc.

_____ Imminent and substantial danger to human health or the environment requires issuance of RCRA 7003 Order and/or CERCLA 106 Order.

_____ Stabilization appropriate.

_____ Issue RCRA 3013 order. Release of hazardous waste presents a substantial hazard to human health or the environment (investigation only).

_____ Refer to CERCLA for further follow-up.

_____ No further CERCLA action

 2 Conduct an RFA

 X as prelude to expected corrective action order

 _____ as prelude to permit issuance

_____ Use a 3007 letter to obtain more information regarding the following items (a subsequent recommendation must be made after the information is received):

 3 Negotiate 3008(h) Consent Order

- Must have documented or probable release of hazardous wastes or constituents

- Must be a RCRA TSDF that has interim status (i.e. not yet permitted, including illegal TSDF that should have had interim status.

- For California, must not have a permit issued by DTSC between 1/13/83 and 11/8/84. Permits issued by DTSC between 11/9/84 and 1/31/86 are considered partial RCRA-equivalent permits; with respect to corrective action, facilities permitted between 11/9/84 and 1/31/86 have interim status.

_____ Incorporate corrective action into post-closure permit through 3004(u) and (v).

_____ Incorporate corrective action into permit through 3004(u) and (v).

_____ Include corrective action in closure plan (appropriate only for surface soil releases near regulated units)

_____ Ongoing or planned State action is sufficient to address release(s). Defer to state or other agency lead (identify):

_____ No further RCRA action at present; re-evaluate next year.

_____ No further RCRA action.

1 Other: Notify USEPA Region 9 and Cal EPA-DTSC Region 2 Permitting Branches of potential presence of contamination at the Drum Storage Area not observed during closure. Acceptance of closure certification should be withheld until this confusion is cleared up. This would also keep the facility in interim status until we can complete an RFA and issue a 3008(h) order, if required. Done on 3/2/92. I notified David Wampler of DTSC and Karen Scheurmann of EPA.
FRZ

✓
_____ Recommendation Accepted

KS

Karen Schwinn
Chief
Waste Compliance Branch

Environmental Benefits:

Raise priority to _____ due to near coastal waters impacts.

Raise priority to _____ due to estuary project impacts.

When applicable, entity to perform RFA:

- _____ State
- _____ FIT (CERCLA)
- X _____ contractor (RCRA)
- _____ Other; specify:

cc: Nancy Nadel, EPI Coordinator, H-4-4

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

AMERICAN NATIONAL CAN COMPANY

EPA SITE NUMBER: CAD 009 162 116

OAKLAND, CA

SCORED BY: FRANK R. GARDNER

OF USEPA REGION 9 HWMD

ON 02/28/92

GROUNDWATER SCORE : 44.56

SURFACE WATER SCORE: 32.34

AIR ROUTE SCORE : 0.00

ONSITE SCORE : 0.00

MIGRATION SCORE : 27.53

Medium

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? Y

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : NA

NET PRECIPITATION (IN.) : NA

PHYSICAL STATE: NA

CONTAINMENT:

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHLOROFORM

TOXICITY/PERSISTENCE VALUE: 18

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS:	0
DRUMS :	0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

GROUNDWATER USE: AGRICULTURE OR INDUSTRIAL

DISTANCE TO WELL (MILES): 0.2

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? N

IS THERE A PERMITTED OUTFALL? N

HAVE THERE BEEN PERMIT VIOLATIONS? N

ROUTE CHARACTERISTICS

FACILITY LOCATION: OTHER

24-HOUR RAINFALL: 2.5

DISTANCE TO SURFACE WATER (MILES): 0.20

PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHLOROFORM

TOXICITY/PERSISTENCE VALUE: 18

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0
DRUMS : 0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

SURFACE WATER USE: QUALITY IMPACTED

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 0.2

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 0.2

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N
DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? N
HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY
CAN CONTAMINANTS MIGRATE INTO AIR? N
CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHLOROFORM
TOXICITY/PERSISTENCE VALUE: 3
QUANTITY KNOWN? NO

CUBIC YARDS OR TONS:	0
DRUMS :	0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES
DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 0.2

EPA ID NO. : CAD 00
AMERICAN NATIONAL CA

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: INACCESSIBLE

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? N

CONTAINMENT: VERY GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHLOROFORM

TOXICITY/PERSISTENCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.10

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: N

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by:

Frank Gardner

Date:

2/28/92

Background Facility Information

Facility Name:

American National Can Company

EPA Identification No.:

CAD 009 162 116

Location (City, State):

Oakland, CA

Facility Priority Rank:

medium

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility?

Explain.

entire facility

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

- ☒ No corrective action activities initiated
- ☐ RCRA Facility Assessment (RFA) or equivalent completed
- ☐ RCRA Facility Investigation (RFI) completed
- ☐ Corrective Measures Study (CMS) completed
- ☐ Corrective Measures Implementation (CMI) begun or completed
- ☐ Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

- ☐ Operating permit
- ☐ Post-closure permit
- ☐ Enforcement order

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

☐ Yes

☒ No

☒ Uncertain; still underway under oversight of county health dept.

CONTINUE TO QUESTION 5 ONLY IF THE FOLLOWING CONDITIONS ARE MET:

- The facility ranks "High" on the National Corrective Action Prioritization System; AND
- Interim Measures have not been initiated, or if initiated, have not been successful in preventing the further spread of contamination at the facility.

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

☒ Ground water

☐ Surface water

☐ Air

☒ Soils

6. Are contaminant releases migrating off-site?

- ☐ Yes; Indicate media, concentrations, and level of certainty.
-
-

- ☐ No
☒ Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

- ☐ Yes
☒ No
☐ Uncertain

7b. Is there a potential for human exposure to the contaminants released from the facility over the next five to 10 years?

- ☐ Yes
☒ No
☐ Uncertain

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

- ☐ Yes
☐ No
☒ Uncertain

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next five to 10 years?

- ☒ Yes
☐ No
☐ Uncertain

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

- ☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

Since no final corrective measures have been identified, it is unknown.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

- ☒ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

It is possible, given the proximity of SF Bay (1000 feet away).

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

- ☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions?

- ☒ Solid
☒ Light non-aqueous phase liquids (LNAPLs)
☐ Dense non-aqueous phase liquids (DNAPLs)
☒ Dissolved in ground water or surface water
☐ Gaseous
☐ Other _____

13. Are one or more of the following major chemical groupings of concern at the facility?

- ☒ Volatile organic compounds (VOCs) and/or semi-volatiles
☐ Polynuclear aromatics (PAHs)
☐ Pesticides
☐ Polychlorinated biphenyls (PCBs) and/or dioxins
☒ Other organics
☐ Inorganics and metals
☐ Explosives
☐ Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

- ☒ Yes; Indicate possible course of action

removal of LNAPL

- ☐ No; Indicate why stabilization technologies are not appropriate; then go to Question 19.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

- ☒ Yes
☐ No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

- ☐ Yes
☐ No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

- ☒ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

LNAPL can be removed before all GW contam. is delineated.

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

- ☒ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

GW can't be permanently remediated until after LNAPL is removed.

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

- ☒ Yes
- ☐ No, not feasible
- ☒ No, not required

Explain final decision, using additional sheets if necessary.

Alameda County has already required
stabilization activities. LNAPL is
being removed by a recovery well,
and it appears that it is a
successful, ongoing operation.